

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF OHIO  
EASTERN DIVISION AT COLUMBUS**

**National Police Association, Inc.; Joseph  
J. Swantack, Jr., an individual; and  
Christine M. Swantack, an individual,**

*Plaintiffs,*

v.

**New Albany Park Condominium  
Association Board of Directors; and  
Lifestyle Communities,**

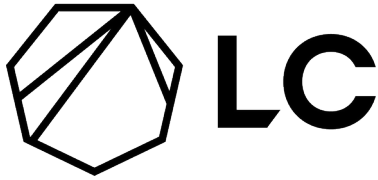
*Defendants.*

**Case No.:**

**EXHIBITS TO COMPLAINT**

James Bopp Jr,  
IN Bar #2838-84\*  
*Lead Counsel for Plaintiffs*  
Cassandra Dougherty,  
CA Bar #336487\*  
*Counsel for Plaintiffs*  
THE BOPP LAW FIRM, PC  
1 South 6th Street  
Terra Haute, Indiana 47807  
Telephone: (812) 232-2434  
[jboppjr@aol.com](mailto:jboppjr@aol.com)  
[cdougherty@bopplaw.com](mailto:cdougherty@bopplaw.com)  
\*Pro hac vice applications  
forthcoming

/s/ Rachel R. Citak  
Rachel R. Citak,  
OH Bar #99253  
*Local Counsel for Plaintiffs*  
RACHEL R. CITAK,  
ATTORNEY AT LAW LLC  
PO Box 54326  
Cincinnati, OH 45254  
Telephone: (513) 845-2121  
[rachel@citaklaw.com](mailto:rachel@citaklaw.com)



07/16/2021

Joe Swantack, Christine Swantack  
5964 Central College Rd  
New Albany, OH 43054

Re: 5964 Central College Rd  
New Albany, OH 43054

### **VIOLATION OF COVENANTS, CONDITIONS, & RESTRICTIONS**

Dear Joe Swantack, Christine Swantack:

This notice is to serve as a reminder of our flag policy at New Albany Park Condominium. The following was noted on 06/25/2021: **Thin blue line flag is not an approved flag.**

Per the community governing documents, Article IX, Section 9.15 of the rules & regulations states that "*Residents may display the American Flag. All other flags/banners are prohibited with the exception of the State of Ohio flag, POW/MIA flag, Gold, Blue, and Silver Star Banners, military deployment banners, and team flags as designated below.*"

Please correct the aforementioned item within fourteen (14) days.

As required under Chapter 5311 and 5312 of the Ohio Revised Code, you have the right to a hearing with the Board of Directors to contest this violation. To request a hearing, please deliver a written or emailed notice within ten (10) days after receiving this notice. After the hearing, the Board or its agent will deliver a written notice of resolution within thirty (30) days of the date of the hearing.

If you feel this is an error, please notify us via email and we will work together to correct it.

On behalf of New Albany Park Condominium,

Lifestyle Communities  
614.918.2100  
mysupport@lifestylecommunities.com





## **COMMUNITY GUIDELINES HANDBOOK**

EFFECTIVE APRIL 1, 2022



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Individual Unit solar panels are not permitted.

## Section 9.13 Open Fires

Open fires including but not limited to fire pits, bonfires, outdoor chimneys, and outdoor fireplaces are prohibited in any area of the condominium property, including any Unit.

### (a) Fireworks

The display or use of fireworks in the community is strictly prohibited.

## Section 9.14 Pest Control

Residents are responsible for pest control within the interior of their home. For areas on the outside of the home, the Association will pay for pest control. To request pest control, please place a maintenance request with the Management Company.

## Section 9.15 Flags

Residents may display the American Flag. All other flags/banners are prohibited except for the State of Ohio flag, POW/MIA flag, Gold, Blue, and Silver Star Banners, military deployment banners, and team flags as designated below. Flags may be displayed in the following manners:

1. Mounted as displayed in the photo below;
2. Pole mounted on the column of your portico;
3. Pole mounted on the trim of a front-loading garage. Flag poles may not be mounted on rear loading garages that face an alleyway.



### (a) Variances

#### (i) Deployed Service Member Flag



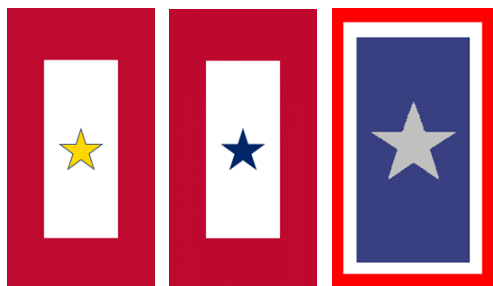
A Unit Owner may display one deployed service member flag in a front window of a condominium Unit for the duration of the deployment of the service member for which the flag is intended.



(ii) Team Flags

Unit Owners may display team flags on game day only.

(iii) Depicted Flags Below

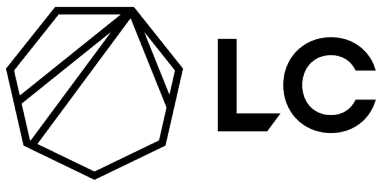


## Section 9.16

## Garage Sales & Solicitation

Garage sales and tag sales are specifically prohibited except where endorsed and approved, in writing, by the Board as a community event. Solicitation is





08/30/2021

Joe Swantack, Christine Swantack  
5964 Central College Rd  
New Albany, OH 43054

Re: 5964 Central College Rd  
New Albany, OH 43054

**VIOLATION OF COVENANTS, CONDITIONS, & RESTRICTIONS**

Dear Joe Swantack, Christine Swantack:

This notice is to inform you that violation of the flag policy at New Albany Park Condominium Association has resulted in a \$50.00 enforcement assessment charged to your account. The following was noted during a recent inspection: **Thin blue line flag is not an approved flag.**

Per the community governing documents, Article IX, Section 9.15 of the rules & regulations states that "*Residents may display the American Flag. All other flags/banners are prohibited with the exception of the State of Ohio flag, POW/MIA flag, Gold, Blue, and Silver Star Banners, military deployment banners, and team flags as designated below.*"

To resolve, you may log in to your online portal to submit a payment to comply with this notice. Further violation of this rule could result in a loss of amenity access and/or legal action. As stated in the governing documents, you do have a right to a hearing with the Board of Directors and Management if you dispute this violation.

On behalf of New Albany Park Condominium Association,

Lifestyle Communities  
614.918.2100  
mysupport@lifestylecommunities.com



**WILLIAMS & STROHM, LLC**

ATTORNEYS AT LAW

Two Miranova Place, Suite 380 • Columbus, Ohio 43215-7047

Tel: 614-228-0207 • Fax: 614-228-6984 • [www.williams-strohm.com](http://www.williams-strohm.com)

**Robin L. Strohm**

[r.strohm@wslawllc.com](mailto:r.strohm@wslawllc.com)

**Nicholas R. Barnes**

[n.barnes@wslawllc.com](mailto:n.barnes@wslawllc.com)

**Brad J. Terman**

[b.terman@wslawllc.com](mailto:b.terman@wslawllc.com)

**Jesse M. Kanitz**

[j.kanitz@wslawllc.com](mailto:j.kanitz@wslawllc.com)

**Charles T. Williams**

Of Counsel

[c.williams@wslawllc.com](mailto:c.williams@wslawllc.com)

September 2, 2021

Christine M. Swantack  
Joseph Swantack  
5964 Central College Road  
New Albany, Ohio 43054

*Sent via Certified and Ordinary U.S. Mail*

Re: **Display of “Thin Blue Line” Flag in Limited Common Elements**

Dear Owners:

This office serves as legal counsel for the New Albany Park Condominium Association (the “Association”). I am writing on behalf of the Association’s Board of Directors (the “Board”) in response to your recent correspondence related to the “Thin Blue Line” flag that you have displayed in the limited common elements adjacent to your condominium unit. As you have previously been advised, the flag is displayed in violation of the New Albany Park governing documents and must be removed immediately.

As you know, the use of all units and the common elements is subject to the Declaration and Bylaws Creating and Establishing a Plan for Condominium Ownership for New Albany Park Condominium (the “Declaration”), the rules and regulations adopted by the Board, and the provisions of Chapter 5311 of the Ohio Revised Code. The Declaration provides in Article III, Section 2(o) that nothing may be hung, placed, displayed, or maintained in any limited common element unless approved in advance by the Board or authorized by an existing rule or regulation. Further, the Board is specifically authorized by Ohio Revised Code §5311.081(B)(4)-(5), Article III, Section 2 *et seq.* of the Declaration, and Article IV, Section 13(f) of the Association’s Bylaws to adopt rules governing the use and appearance of the condominium property. Pursuant to this authority, the Association has adopted rules regarding the display of flags outside of units and in

Pls. Exhibit 4



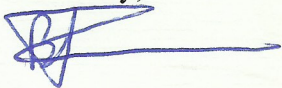
the limited common areas. These rules, which have been published in the Association's handbook, specify that only the flag of the United States, the flag of the State of Ohio, the POW/MIA flag, and service star flags may be displayed. These are the same flags designated in Ohio Revised Code §5311.191 as those permitted to be displayed on condominium property as a matter of public policy in Ohio.

You have requested an exception to the established rules and regulations for the purposes of displaying a "Thin Blue Line" flag. The Board has considered your request and has declined to modify the established rules and regulations. In response, you have stated that you are "appalled" that the Board would have the "audacity" not to approve an exception and that it could only do so based upon a "complete lack of respect for law enforcement" and "utter disrespect of the dead." These allegations are both entirely unfounded and offensive. Your belief that the denial was "politically motivated" is also incorrect. To the contrary, the Board must adopt and enforce generally applicable rules and regulations based upon neutral criteria. It does not, and cannot, base its decisions on the personal beliefs and preferences of its members and it does not and cannot favor any political perspective over any other. Indeed, the specific, neutrally applicable, and impartial limits on the flags and signs that can be displayed exist precisely to ensure that all residents are treated fairly and evenhandedly regardless of political opinion or other factors.

Finally, you have advised that, regardless of the rules and the law, the flag will not be removed and you advise that the Board must "reconsider its vote" or you will "open a dialogue with the Ohio Attorney General's Office." While you are free to open a dialogue with whomever you wish, the Ohio Attorney General has no role to play in this matter. As noted above, all flags required to be permitted by Ohio law are indeed permitted under the Association's rules. The display of the "Thin Blue Line" flag is a violation of the governing documents and your immediate and continuing compliance is required by Ohio Revised Code §5311.19.

Please be advised that you must immediately remove any unapproved and unauthorized flag within fourteen (14) days from the date of this letter. Should you fail to come into compliance as requested, the Association will be forced to proceed with formal action to enforce the Declaration and rules. This may include, without limitation, the imposition of enforcement assessments (fines) until compliance is achieved or the institution of legal proceedings pursuant to Ohio Revised Code §5311.19(A) for declaratory and injunctive relief. Any and all costs incurred by the Association in enforcing the governing documents, including attorneys fees, will be assessed to your unit. Please take the above requested remedial actions so additional enforcement does not become necessary.

Sincerely,

A handwritten signature in blue ink, appearing to read "BJ Terman", with a long horizontal line extending to the right.

Brad J. Terman

Cc: Property Manager; Board



09/17/2021

Joe Swantack, Christine Swantack  
5964 Central College Rd  
New Albany, OH 43054

Re: 5964 Central College Rd  
New Albany, OH 43054

**VIOLATION OF COVENANTS, CONDITIONS, & RESTRICTIONS**

Dear Joe Swantack, Christine Swantack:

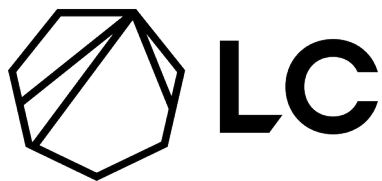
This notice is to inform you that violation of the flag policy at New Albany Park Condominium Association has resulted in a \$100.00 enforcement assessment charged to your account.

Per the community governing documents, Article IX, Section 9.15 of the rules & regulations states that "*Residents may display the American Flag. All other flags/banners are prohibited with the exception of the State of Ohio flag, POW/MIA flag, Gold, Blue, and Silver Star Banners, military deployment banners, and team flags as designated below.*"

To resolve, you may log in to your online portal to submit a payment to comply with this notice. Further violation of this rule could result in a loss of amenity access and/or legal action. As required under Chapter 5311 and 5312 of the Ohio Revised Code, you have the right to a hearing with the Board of Directors to contest this violation if you have not already done so. To request a hearing, please deliver a written or emailed notice within ten (10) days after receiving this notice. After the hearing, the Board or its agent will deliver a written notice of resolution within thirty (30) days of the date of the hearing.

On behalf of New Albany Park Condominium Association,

Lifestyle Communities  
614.918.2100  
mysupport@lifestylecommunities.com



10/11/2021

Christine Swantack  
5964 Central College Rd  
New Albany, OH 43054

Re: 5964 Central College Rd  
New Albany, OH 43054

### **NOTIFICATION OF BALANCE DUE**

Dear Christine Swantack:

Our records indicate an unpaid balance on your account in the amount of **\$635.00** for the above-referenced property. Attached to this letter is a copy of your ledger which will outline charges related to this balance. Per the collection policy, if the Association does not receive full payment of a common expense by its due date, the delinquent member may be charged a late fee.

If your records indicate payment was made, please provide the reference or check number, amount, and the approximate date the payment cleared your bank. Once that is provided to us, we will be able to research the discrepancy in our system.

New Albany Park Condominium Association relies on your prompt payment of Assessments so that they can meet their obligations in a timely manner. If you have not sent payment, please remit payment via the online portal at [portal.lcassociations.com](http://portal.lcassociations.com), or mail a check to:

**New Albany Park Condominium Association  
c/o Lifestyle Property Management  
P.O. Box 97861  
Las Vegas, NV 89193-3504**

If you have any questions, please contact our Association Management team for further assistance.

On behalf of New Albany Park Condominium Association,

Lifestyle Communities  
614.918.2100  
[associationAR@lifestylecommunities.com](mailto:associationAR@lifestylecommunities.com)



**Homeowner Ledger****Homeowner:** Christine Swantack**Home:** (614) 915-4631**Unit Name:** 47-5964**Unit Address:** 5964 Central College Rd New Albany, OH 43054**Association:** New Albany Park Condominium Association**Status:** Current**Dues:** 209.00

Date	Payer	Description	Charges	Payments	Balance
Starting Balance					0.00
10/30/2019	Christine Swantack	Payment (Reference #17313942)		196.00	-196.00
11/01/2019		Assessments - November 2019	196.00		0.00
12/01/2019		Assessments - December 2019	196.00		196.00
12/02/2019	Christine Swantack	Payment (Reference #017597001)		196.00	0.00
12/30/2019	Christine Swantack	Payment (Reference #017796235)		196.00	-196.00
01/01/2020		Assessments - January 2020	203.00		7.00
01/22/2020	Christine Swantack	Payment (Reference #018067972)		207.00	-200.00
01/22/2020	Christine Swantack	Payment (Reference #018067976)		3.00	-203.00
02/01/2020		Assessments - February 2020	203.00		0.00
02/28/2020	Christine Swantack	Payment (Reference #018369243)		203.00	-203.00
03/01/2020		Assessments - March 2020	203.00		0.00
03/30/2020	Christine Swantack	Payment (Reference #018630898)		203.00	-203.00
04/01/2020		Assessments - April 2020	203.00		0.00
04/28/2020	Christine Swantack	Payment (Reference #018920816)		203.00	-203.00
05/01/2020		Assessments - May 2020	203.00		0.00
05/28/2020	Christine Swantack	Payment (Reference #020642341)		203.00	-203.00
06/01/2020		Assessments - June 2020	203.00		0.00
06/29/2020	Christine Swantack	Payment (Reference #020775917)		203.00	-203.00
07/01/2020		Assessments - July 2020	203.00		0.00
07/28/2020	Christine Swantack	Payment (Reference #020972728)		203.00	-203.00
08/01/2020		Assessments - August 2020	203.00		0.00
08/28/2020	Christine Swantack	Payment (Reference #021197413)		203.00	-203.00
09/01/2020		Assessments - September 2020	203.00		0.00
09/28/2020	Christine Swantack	Payment (Reference #021461326)		203.00	-203.00
10/01/2020		Assessments - October 2020	203.00		0.00
10/28/2020	Christine Swantack	Payment (Reference #021769884)		203.00	-203.00
11/01/2020		Assessments - November 2020	203.00		0.00
11/30/2020	Christine Swantack	Payment (Reference #022054125)		203.00	-203.00
12/01/2020		Assessments - December 2020	203.00		0.00
12/28/2020	Christine Swantack	Payment (Reference #022361954)		203.00	-203.00
01/01/2021		Assessments - January 2021	209.00		6.00
01/13/2021	Christine Swantack	ACH Payment (Reference #14D4-5710)		6.00	0.00
01/20/2021		Enforcement Assessments - Violation Fee: Flag Policy	50.00		50.00
01/28/2021	Christine Swantack	ACH Payment (Reference #0094-7C00)		209.00	-159.00
01/28/2021	Joe Swantack	Payment (Reference #022791780)		203.00	-362.00
02/01/2021		Assessments - February 2021	209.00		-153.00
02/28/2021	Christine Swantack	ACH Payment (Reference #00C3-B6A0)		209.00	-362.00
03/01/2021		Assessments - March 2021	209.00		-153.00
03/01/2021	Joe Swantack	Payment (Reference #023182902)		203.00	-356.00

Pls. Exhibit 6

**Homeowner Ledger**

Date	Payer	Description	Charges	Payments	Balance
03/28/2021	Christine Swantack	ACH Payment (Reference #7DA3-04C0)		209.00	-565.00
03/29/2021	Joe Swantack	Payment (Reference #023479739)		203.00	-768.00
04/01/2021		Assessments - April 2021	209.00		-559.00
05/01/2021		Assessments - May 2021	209.00		-350.00
05/28/2021	Christine Swantack	ACH Payment (Reference #CE67-2190)		209.00	-559.00
06/01/2021		Assessments - June 2021	209.00		-350.00
07/01/2021		Assessments - July 2021	209.00		-141.00
07/28/2021	Christine Swantack	ACH Payment (Reference #27F2-0DD0)		209.00	-350.00
08/01/2021		Assessments - August 2021	209.00		-141.00
08/28/2021	Christine Swantack	ACH Payment (Reference #4870-F400)		68.00	-209.00
08/30/2021		Enforcement Assessments - Violation Fee: Flag Policy	50.00		-159.00
09/01/2021		Assessments - September 2021	209.00		50.00
09/17/2021		Enforcement Assessments - Violation Fee: Flag Policy	100.00		150.00
09/30/2021	Christine Swantack	ACH Payment (Reference #0EBE-FA30)		209.00	-59.00
10/01/2021		Assessments - October 2021	209.00		150.00
10/01/2021		Enforcement Assessments - Violation Fee: Flag Policy	100.00		250.00
10/07/2021		Legal - Demand Letter + Correspondence	292.50		542.50
10/07/2021		Legal - Review of Emails Regarding Flag Enforcement	67.50		610.00
10/11/2021		Late Fee - Late Fee for Oct 2021	25.00		635.00

<b>Total</b>					<b>635.00</b>
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## Joe Swantack

---

**From:** Cody Curtis <[ccurtis@lifestylecommunities.com](mailto:ccurtis@lifestylecommunities.com)>  
**Sent:** Friday, October 15, 2021 1:23 PM  
**To:** Christine Swantack  
**Cc:** NAP Board of Directors; Joe Swantack  
**Subject:** Re: AR - Notification of Balance Due - Swantack - Subpoena Duces Tecum

Hi Christine,

I am just waiting for the redacted invoice and will get that over to you.

On Wed, Oct 13, 2021 at 5:25 PM Cody Curtis <[ccurtis@lifestylecommunities.com](mailto:ccurtis@lifestylecommunities.com)> wrote:

Hi Christine,

I will retrieve the invoice from the Association's counsel and get that over to you by end of business Friday.

Thanks-  
Cody

On Tue, Oct 12, 2021 at 11:46 AM Christine Swantack <[christineswantack5@gmail.com](mailto:christineswantack5@gmail.com)> wrote:

Dear Lifestyles Communities,

In light of the Board's inability to hold a hearing with me on October 18, 2021 @ 6:00pm, as offered on 09/20/2021 by the Board, I request an immediate 'stay' on all current, new, and/or future 'enforcement assessments, imposition of legal fees, and/or actions', until a direct/virtual meeting with the Board can be arranged and the issue is resolved.

And as per my request for all relevant documents pertaining to the 'Thin Blue Line' flag matter, please forward copies of the invoices you have received from the Lifestyles Communities legal counsel that you have 'imposed and assessed' on me, for my review and file.

Regards,

Christine Swantack

On Tue, Oct 12, 2021 at 10:55 AM Cody Curtis <[ccurtis@lifestylecommunities.com](mailto:ccurtis@lifestylecommunities.com)> wrote:

Hi Christine,

Thank you for following up. We will have to schedule another time as that time slot is no longer available due to a guest speaker at the Board meeting. I will add this matter to the agenda for the Executive Board meeting following the regular meeting to determine the availability of the Board. In order to hold the hearing, we must have 4 Board Members present to constitute a quorum.

As for the correspondence, everything that has been sent has already been sent to both you and Joe directly. Please let me know if you need anything else.

Thanks,  
Cody Curtis

Thank you,  
Cody Curtis

On Mon, Oct 11, 2021 at 5:02 PM Christine Swantack <[christineswantack5@gmail.com](mailto:christineswantack5@gmail.com)> wrote:  
Dear Lifestyles Communities,

In preparation for the upcoming Board meeting on 10/18/2021, please immediately forward to my attention copies of all: Enforcement Assessments, Legal - Demand Letter + Correspondences, Legal - Review of Emails Regarding Flag Enforcement documents, and any relevant documents or conversations the Board has had specific our flying of the 'Thin Blue Line flag at my residence: 5964 Central College Road, New Albany, OH, in support of law enforcement.

I 'will' be available to attend a 6:00pm Board meeting on 10/18/2021 'prior' to the regular Board meeting at 6:30pm, per your invitation dated 09/20/2021 @ 11:01am, sent to my husband, Joe Swantack, at STARK Industries.

Regards,

Christine Swantackhusband

On Mon, Oct 11, 2021, 3:36 PM Lifestyle Communities  
<[f404911792d4c257489fde6562f34c7d2119a9dc616972ad44b680f76ce928e5@lifestylecommunities.mailer.appfoli](mailto:f404911792d4c257489fde6562f34c7d2119a9dc616972ad44b680f76ce928e5@lifestylecommunities.mailer.appfoli)  
[o.us](mailto:f404911792d4c257489fde6562f34c7d2119a9dc616972ad44b680f76ce928e5@lifestylecommunities.mailer.appfolio.us)> wrote:

Dear Owner,

Please see the attached notification of balance due for your Association account. To review your account and make a payment, please log in to the LC Online Portal by visiting [portal.lcassociations.com](http://portal.lcassociations.com).

If you have any questions, please email us at [associationAR@lifestylecommunities.com](mailto:associationAR@lifestylecommunities.com).

Sincerely,  
Lifestyle Communities



**CODY CURTIS, CMCA® | MANAGER, ASSOCIATIONS**

TEAM MEMBER SINCE 2014

O: 614.918.2100 | D: 614.918.2084

**HERE TO CONNECT** ↗



...

We want to hear about your experience with LC Associations.  
Tell us how we're doing by [clicking here](#).

--



**CODY CURTIS, CMCA® | MANAGER, ASSOCIATIONS**

TEAM MEMBER SINCE 2014

O: 614.918.2100 | D: 614.918.2084

**HERE TO CONNECT** ↗



...

We want to hear about your experience with LC Associations.  
Tell us how we're doing by [clicking here](#).

--



**CODY CURTIS, CMCA® | MANAGER, ASSOCIATIONS**

TEAM MEMBER SINCE 2014

O: 614.918.2100 | D: 614.918.2084

**HERE TO CONNECT** ↗



...

We want to hear about your experience with LC Associations.  
Tell us how we're doing by [clicking here](#).



---

**From:** Cody Curtis <[ccurtis@lifestylecommunities.com](mailto:ccurtis@lifestylecommunities.com)>  
**Sent:** Friday, November 5, 2021 11:14 AM  
**To:** Joe Swantack <[joe.swantack@stark-industries-llc.com](mailto:joe.swantack@stark-industries-llc.com)>  
**Cc:** NAP Board of Directors <[board@newalbanyparkcondo.com](mailto:board@newalbanyparkcondo.com)>; [christineswantack5@gmail.com](mailto:christineswantack5@gmail.com)  
**Subject:** Re: [NAP Board] Swantack - 'Thin Blue Line' Flag | New Albany, OH

Joe,

Please disregard the previous email. Your up-to-date statement is attached here.

On Fri, Nov 5, 2021 at 10:35 AM Cody Curtis <[ccurtis@lifestylecommunities.com](mailto:ccurtis@lifestylecommunities.com)> wrote:

Dear Joe,

Please see the attached statement which includes the additional legal fees + the regular December assessment. I also included the redacted legal invoice. To avoid a late fee, please pay the amount shown by 12/10/2021.

Thank you,  
Cody Curtis

On Fri, Oct 22, 2021 at 8:00 AM Cody Curtis <[ccurtis@lifestylecommunities.com](mailto:ccurtis@lifestylecommunities.com)> wrote:

Will do, thank you.

On Thu, Oct 21, 2021 at 11:42 AM Joe Swantack <[joe.swantack@stark-industries-llc.com](mailto:joe.swantack@stark-industries-llc.com)> wrote:

Dear LC Association and NAP Board of Directors,

Please forward the all-inclusive legal fees related to our interaction and the LC

Pls. Exhibit 8

Association's legal counsel's interaction with ABC 6, to both my attention, and to my wife Christine Swantack, upon their availability.

Regards,

**Joseph J. Swantack**

Co-founder & CEO, STARK Industries LLC

Co-founder & President, Spiritus Medical Inc

**STARK Industries LLC**

20 South Third Street, Suite 210A

Columbus, Ohio 43215 USA

Office: +1 (614) 324-3264

Web: [www.stark-industries-llc.com](http://www.stark-industries-llc.com)

**Spiritus Medical Inc**

100 E. Campus View Blvd, Suite 250A

Columbus, Ohio 43235 USA

Office: +1 (614) 987-0020

Web: [www.spiritusmedical.com](http://www.spiritusmedical.com)

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**From:** Cody Curtis <[ccurtis@lifestylecommunities.com](mailto:ccurtis@lifestylecommunities.com)>

**Sent:** Wednesday, October 20, 2021 1:09 PM

**To:** Joe Swantack <[joe.swantack@stark-industries-llc.com](mailto:joe.swantack@stark-industries-llc.com)>

**Cc:** NAP Board of Directors <[board@newalbanyparkcondo.com](mailto:board@newalbanyparkcondo.com)>; bterman <[b.terman@wslawllc.com](mailto:b.terman@wslawllc.com)>; NPA <[info@nationalpoliceassociation.com](mailto:info@nationalpoliceassociation.com)>; [christineswantack5@gmail.com](mailto:christineswantack5@gmail.com)

**Subject:** Re: [NAP Board] Swantack - 'Thin Blue Line' Flag | New Albany, OH

Hello Joe,

Thank you for your email and for letting us know your intent and decision to bring your unit into compliance. Should there ever be a legal requirement to allow for this flag, the handbook will be adjusted accordingly.

Please note that the legal fees that were charged to your account are not all-inclusive of the recent legal fees related to our interaction with WSYX ABC 6. The Association has not received the bill yet, but once it is received, the fees will be charged back to your account accordingly and due in accordance with the Association's established collection policy.

Please let me know if you have any further questions.

Thank you,  
Cody Curtis

On Wed, Oct 20, 2021 at 12:33 PM Joe Swantack <[joe.swantack@stark-industries-llc.com](mailto:joe.swantack@stark-industries-llc.com)> wrote:

Dear LC Association and NAP Board of Directors,

This memo serves as advising you that Mrs. Christine Swantack, and I, will pay the accumulated fines and legal assessments that have been assessed and imposed on us, here at our residence at 5964 Central College Road, New Albany, OH, by the end of the month [October] and that the 'Thin Blue Line' flag has been taken down. But,

Pls. Exhibit 8

if Mrs. Swantack and I learn that we have a legal right to display the 'Thin Blue Line' flag in the future, we will place the flag back.

Regards,

**Joseph J. Swantack**

Co-founder & CEO, STARK Industries LLC

Co-founder & President, Spiritus Medical Inc

**STARK Industries LLC**

20 South Third Street, Suite 210A

Columbus, Ohio 43215 USA

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**CODY CURTIS, CMCA® | MANAGER, ASSOCIATIONS**

TEAM MEMBER SINCE 2014

O: 614.918.2100 | D: 614.918.2084

...

We want to hear about your experience with LC Associations.

Tell us how we're doing by [clicking here](#).

--

**CODY CURTIS, CMCA® | MANAGER, ASSOCIATIONS**

TEAM MEMBER SINCE 2014

O: 614.918.2100 | D: 614.918.2084

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**CODY CURTIS, CMCA® | MANAGER, ASSOCIATIONS**

TEAM MEMBER SINCE 2014

O: 614.918.2100 | D: 614.918.2084


...

We want to hear about your experience with LC Associations.  
Tell us how we're doing by [clicking here](#).

DIRECT ALL QUESTIONS TO

STATEMENT DATE



**Lifestyle Communities**  
230 West Street  
Suite 200  
Columbus, OH 43215  
(614) 918-2100

[lcassociations.com](http://lcassociations.com)

Please address billing disputes and written inquiries to Lifestyle Communities, 230 West Street, Suite 200, Columbus, OH 43215. For other questions, call (614) 918-2100

STATEMENT FOR

**Christine Swantack**  
5964 Central College Rd  
New Albany, OH 43054

November 05, 2021

If you receive this statement, your account currently reflects an unpaid balance. To review your account history and to make a payment, please visit [portal.lcassociations.com](http://portal.lcassociations.com).

Please contact us with any questions at [associationAR@lifestylecommunities.com](mailto:associationAR@lifestylecommunities.com).

TOTAL AMOUNT DUE

Please pay this amount by **12/10/2021**

**\$1,289.00**

PAY THIS BILL ONLINE AT

<https://lifestylecommunities.appfolio.com/connect>

DATE	DESCRIPTION	TIME PERIOD	AMOUNT	BALANCE
CURRENT & UPCOMING CHARGES				
05 NOV	LEGAL	FLAG ENFORCEMENT	<b>\$967.50</b>	<b>\$967.50</b>
05 NOV	LEGAL	FLAG ENFORCEMENT - 8.2.2021	<b>\$112.50</b>	<b>\$1,080.00</b>
01 DEC	ASSESSMENTS	DECEMBER 2021	<b>\$209.00</b>	<b>\$1,289.00</b>

Please detach this portion and mail it with your payment

PAYMENT DETAILS

**Christine Swantack**  
Account # **47-5964**

MAKE CHECKS PAYABLE TO

New Albany Park Condominium Association  
Association ID **NAP**

TOTAL AMOUNT DUE

Please pay this amount by **12/10/2021**

**\$1,289.00**

PAY THIS BILL ONLINE AT

<https://lifestylecommunities.appfolio.com/connect>

MAIL PAYMENT TO

New Albany Park Condominium Association  
Lifestyle Communities - 2566  
P.O. Box 97861  
Las Vegas, NV 89193-3504

AMOUNT ENCLOSED:

2566 000NAP 00000000047-5964 SWANTACK0000 128900 5

Pls. Exhibit 9

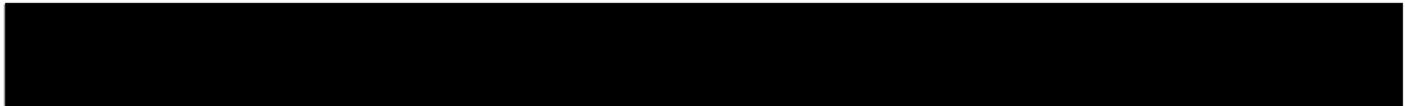
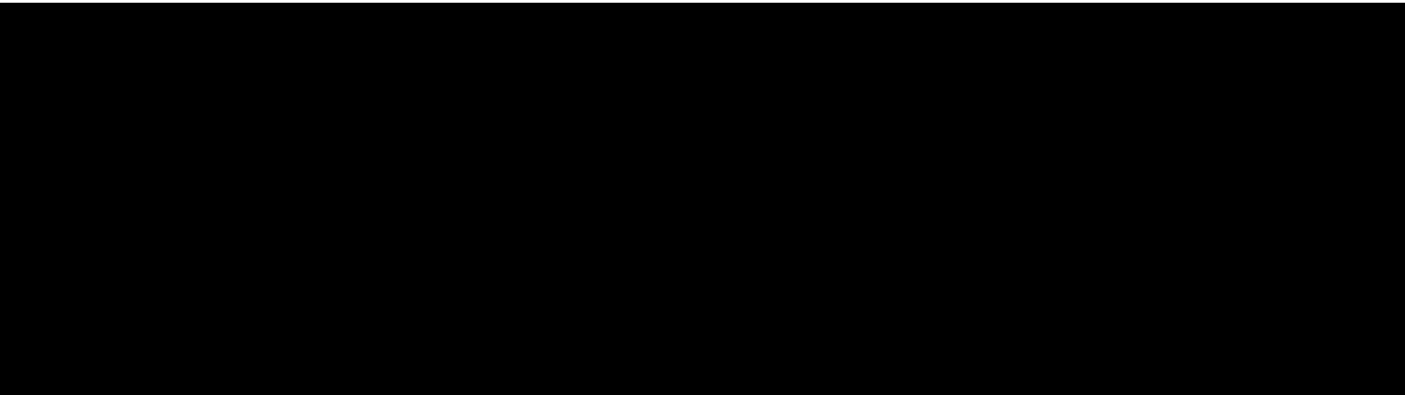


**WILLIAMS & STROHM, LLC**  
ATTORNEYS AT LAW  
Two Miranova Place, Suite 380  
Columbus, OH 43215-7047  
614-228-0207

New Albany Park Condo. Assoc.  
c/o Lifestyle Property Management  
230 West Street, Suite 200  
Columbus, OH 43215

August 2, 2021

Professional Services

		<u>Hrs/Rate</u>	<u>Amount</u>
			
7/30/2021	BT Telephone conference and exchange emails with PM regarding Joseph Swantack violation and options for proceeding.	0.50 225.00/hr	112.50
			

**WILLIAMS & STROHM, LLC**  
**ATTORNEYS AT LAW**  
Two Miranova Place, Suite 380  
Columbus, OH 43215-7047  
614-228-0207

New Albany Park Condo. Assoc.  
c/o Lifestyle Property Management  
230 West Street, Suite 200  
Columbus, OH 43215

November 1, 2021

Professional Services

		<u>Hrs/Rate</u>	<u>Amount</u>
10/13/2021	BT	Exchange emails with PM and board members regarding request for comment from television reporter on enforcement issue at 5964 Central College Road. Draft written statement to respond to request from reporter. Phone conference with PM regarding response. Phone call with reporter declining further comment.	1.80 225.00/hr 405.00
	NB	Reviewing 5 collective emails from the Board regarding the news media inquiry related to a story about an owner's blue line flag. Reviewing and revising draft comment to the news media on the issue.	0.70 225.00/hr 157.50
10/19/2021			
	BT	Review correspondence from owner and third party police support organization. Prepare email to board and PM with recommendations and legal advice for proceeding with enforcement based upon most recent activity. (Swantack, Christine - 5964 Central College Road)	0.30 225.00/hr 67.50
	NB	Receipt and review of 4 collective emails from property manager, Cody Curtis, and Attorney Brad Terman regarding the Joe Swantack flag enforcement matter. Sending 2 emails to the Board, Mr. Curtis, and Mr. Terman regarding issues, strategy, and advice regarding the Swantack enforcement matter. Receipt, review, and response to email from Board member, Zachary Hazlett, regarding the same.	0.60 225.00/hr 135.00
10/20/2021	BT	Begin draft of complaint for injunctive and monetary relief. Stop drafting upon receipt of correspondence from owner that they will comply. (Swantack, Christine - 5964 Central College Road)	0.90 225.00/hr 202.50

Payment due upon receipt; does not include payments made after November 1, 2021

Pls. Exhibit 10

New Albany Park Condo. Assoc.

Page 2

Hrs/Rate      Amount

[REDACTED]

[REDACTED]